

Exhibit 6C

Excerpt from the Deposition of Charles Moore

1 UNITED STATES BANKRUPTCY COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 In Re:

6
7 CITY OF DETROIT, MICHIGAN

Chapter 9

8 Case No.13-53846

9 Debtor.

Hon. Steven Rhodes

10 _____ /
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13 The Deposition of CHARLES MOORE,
14 Taken at 150 West Jefferson Avenue, Suite 2500,
15 Detroit, Michigan,
16 Commencing at 10:00 a.m.,
17 Wednesday, December 4, 2013,
18 Before Kathy Adkins, CRR, RMR, CSR-4697.
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1 Detroit, Michigan

2 Wednesday December 4, 2013

3 10:00 a.m.

4
5 CHARLES MOORE,

6 was thereupon called as a witness herein, and after
7 having first been duly sworn to testify to the truth,
8 the whole truth and nothing but the truth, was
9 examined and testified as follows:

10 MARKED FOR IDENTIFICATION

11 EXHIBIT 1

12 9:57 a.m.

13 EXAMINATION

14 BY MR. HACKNEY:

15 Q. Mr. Moore, good morning. Can you state your name for
16 the record, please.

17 A. Yes. Charles Moore, M-O-O-R-E.

18 Q. It's my understanding that you've had your deposition
19 taken a number of times before, is that correct?

20 A. Yes, sir.

21 Q. And it's fair to say that you have a general
22 understanding of the way a deposition process works,
23 is that correct?

24 A. Yes.

25 Q. The most important rule from my standpoint is that if

1 A. Yes.

2 Q. And the scope of services did not change with the
3 amendment as you understand it, correct?

4 A. Correct.

5 Q. And is Conway MacKenzie performing all of the services
6 that are described in Exhibit A?

7 A. Yes.

8 Q. Do you see that on the first page of Exhibit A, which
9 also has got the number three on it under the
10 contract, do you see that down at the bottom?

11 A. Yes, sir.

12 Q. Do you see that it says that one of the things that
13 you will do is that you will work collaboratively with
14 City of Detroit, State of Michigan, and outside
15 professionals to develop a detailed, comprehensive
16 work plan, do you see that?

17 A. Yes.

18 Q. Did Conway MacKenzie do that?

19 A. Yes.

20 Q. Do you know when it completed that work plan?

21 MR. HAMILTON: Object to form.

22 A. The initial work plan that was established would have
23 been completed in January of 2013.

24 BY MR. HACKNEY:

25 Q. You said initial, are you suggesting that it's

1 something that is constantly revised or has been
2 revised since the initial one was completed?

3 A. Yes, a work plan is essentially meant to identify
4 tasks that need to be performed and manage those
5 tasks, and so periodically we are providing updates to
6 the City regarding upcoming tasks.

7 Q. So is this one of those things where as tasks are
8 completed, the completion of the tasks are noted, as
9 additional tasks are added, they are added to the work
10 plan and it's an organic living document?

11 A. Yes.

12 Q. How regularly is that updated?

13 A. There's not a set frequency. Sometimes, and by the
14 way, there may be multiple items that can be
15 considered a work plan. Our communications with the
16 department regarding upcoming activities may take one
17 form, our communications with say the emergency
18 manager office may take another form. Generally
19 speaking, every two to three weeks or so documents are
20 updated.

21 Q. Is the work plan something that's available to
22 creditors to your knowledge?

23 A. I'm not aware.

24 Q. Okay. Do you know whether you've ever been, have you
25 ever been asked to produce it so that it could go into